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JUL 15 2008

July 15, 2008

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Honorable Debra Freeman
United States Magistrate Judge
United States Courthouse
40 Foley Square
New York, New York 10007

JOINT APPLICATION

MEMO ENDORSED

Re: Federal Insurance Company
v. M/V "SCI TEJ", et al.
07 Civ.7797 (LTS)
Our File: 7C-1497

Dear Judge Freeman:

I represent the plaintiff in this admiralty action and submit this joint application with the consent of defense counsel.

There have been further discussions concerning possible settlement. However there is a sizeable spread between the parties' positions. There are a number of factual issues in dispute, resolution of which may facilitate an accord. For this reason counsel have agreed, subject to Your Honor's approval, to propose that the July 21, 2008 non-expert discovery deadline be extended to coincide with the August 27, 2008 expert discovery deadline. This will allow counsel the opportunity to continue efforts to narrow certain issues without delaying the outer deadlines in the scheduling order. The Court's further indulgence will be greatly appreciated.

Respectfully,


David L. Mazaroli

cc: Brown Gavalas & Fromm LLP
Attn.: Peter Skoufalos, Esq.
(Via e-mail: pskoufalos@browngavalas.com)

SO ORDERED: DATE: 7/16/08

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DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE